



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

File I 1
12/8/94
158473

REPLY TO THE ATTENTION OF

December 8, 1994

HSE-5J

Mr. Tom Crause
Site Assessment Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62794-9276

Dear Mr. Crause:

This letter requests that the Illinois Environmental Protection Agency identify all Applicable, Relevant, and Appropriate Requirements (ARARs) for upcoming removal actions associated with the Sauget Area 2, Site Q drum removal within the Village of Sauget, St. Clair County, Illinois. Any State ARARs identified in a timely manner for this removal action will be complied with to the extent practicable. The United States Environmental Protection Agency has funded an emergency removal to address PCB contaminated drummed material on/in the bank of the Mississippi River and Sauget and Company Landfill.

If you have any questions regarding this letter, please feel free to contact me at (312) 353-2886.

Sincerely,

A handwritten signature in cursive script, appearing to read "Samuel F. Borries".

Samuel F. Borries,
On-Scene Coordinator
U.S. EPA, Region V

bcc: D. Bruce, EPA
D. Tanaka, EPA ORC
R. Karl, EPA ERB
EERB Site File (Earl Brenneman, SF Central Filing Room)



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

December 22, 1994

Mr. Samuel Borries
Emergency Response Branch
U.S. Environmental Protection Agency
Region V Offices
77 West Jackson
Chicago, Illinois 60604

Mail Code HSE-5J

RE: L1631210001 - St. Clair County
Sauget Area 2 Sites - Site Q
ILD 000605790
Superfund/Tech

Dear Mr. Borries:

As per telecom on December 21, 1994, I am forwarding a copy of Applicable or Relevant and Appropriate Requirements (ARARs) that may be apply to the USEPA Emergency Response Branch's removal of the drums and associated soils located along the banks of the Mississippi River at Sauget.

I have sent a copy of the scope of work to the IEPA's Bureau of Land Permit Section for their review. I will also be sending a copy of the scope of work to several other state agencies for their review and comment. As soon as I receive comments from them I will forward them on to you.

If you have any questions or comments concerning this transmittal, please do not hesitate to call me at 217/524-1654.

Sincerely,

Kimberlee A. Hubbert
Environmental Protection Specialist
Site Assessment Unit
Remedial Project Management Section
Bureau of Land

Attachment

cc: Alan Altur, USEPA Region V
Paul Takacs (w/o attachments)
Collinsville Region
Division File

APPENDIX A

APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS a/

1. Office of Solid Waste

- Resource Conservation and Recovery Act of 1976 (42 U.S.C. 6901) b/
 - a. 40 CFR Part 264, applicable for permitted facilities c/, and 40 CFR Part 265, for interim status facilities.
 - Groundwater Protection (40 CFR 264.90-264.101)
 - Groundwater Monitoring, Subpart F (40 CFR 264.98-264.100) d/
 - Closure and Post-Closure (40 CFR 264.110-264.120, 265.110-265.120)
 - Containers (40 CFR 264.170-264.178, 265.190-265.177)
 - Tanks (40 CFR 264.190-264.200, 265.190-265.199)
 - Surface Impoundments (40 CFR 264.220-264.249, 265.220-265.230)
 - Waste Piles (40 CFR 264.250-264.269, 265.250-265.258)
 - Land Treatment (40 CFR 264.270-264.299, 265.270-265.282)
 - Incinerators (40 CFR 264.340-264.999, 265.340-265.369)
 - Land Disposal Restrictions (40 CFR 268.1-268.50)
 - b. 40 CFR Part 280, Underground Storage Tank Regulations
 - c. Statutory requirements, including:
 - Liquids in Landfills (RCRA §3004(c))
 - Minimum Technology Requirements (RCRA §3004(o), 3005(j))
 - Dust Suppression (RCRA §3004(e))
 - Hazardous Waste Used as Fuel (RCRA §3004(q))
 - d. Open Dump Criteria - pursuant to RCRA Subtitle D: criteria for classification of solid waste disposal facilities (40 CFR Part 257). Note: For nonhazardous wastes.

2. Office of Water

- The Safe Drinking Water Act (42 U.S.C. 300(f))
 - a. Maximum Contaminant Levels (chemicals, turbidity, and microbiological contamination) (for drinking water or human consumption) (40 CFR 141.11-141.16).
 - b. Maximum Contaminant Level Goals (40 CFR 141.50-141.51, 50 FR 46936).

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- Clean Water Act (33 U.S.C. 1251)
Requirements established pursuant to sections 301 (effluent limitations), 302 (effluent limitations), 303 (water quality standards, including State water quality standards), 304 (Federal water quality criteria), 306 (national performance standards), 307 (toxic and pretreatment standards, including Federal pretreatment standards for discharge into publicly owned treatment works, and numeric standards for toxics), 402 (national pollutant discharge elimination system), 403 (ocean discharge criteria), and 404 (dredged or fill material) of the Clean Water Act, (33 CFR Parts 320-330, 40 CFR Parts 122, 123, 125, 131, 230, 231, 233, 400-469). Available ambient Water Quality Criteria Documents are listed at 45 FR 79318, November 28, 1980; 49 FR 5831, February 15, 1984; 50 FR 30784, July 29, 1985; 51 FR 22978, June 28, 1986; 51 FR 43665, December 3, 1986; 51 FR 8012, March 7, 1986; 52 FR 6213, March 2, 1987.

- EPA's Statement of Procedures on Floodplains Management and Wetlands Protection. (40 CFR Part 6 Appendix A) g/

3. Office of Air and Radiation

- Clean Air Act (42 U.S.C. 7401)
 - a. National Emissions Standards for Hazardous Air Pollutants for Asbestos and Wet Dust particulates, (40 CFR 61.140-61.156), and for other hazardous substances (40 CFR Part 61 generally). See also effluent limitations and pretreatment standards for Wet Dust Collection (40 CFR 427.110-427.116) and 40 CFR Part 763.
 - b. Standards of performance for new stationary sources, including new incinerators (42 U.S.C. 7411), (40 CFR Part 60).

4. Other Federal Requirements

- OSHA requirements for workers engaged in response or other hazardous waste operations (29 CFR 1910.120).
- Occupational Safety and Health Act of 1970 (29 U.S.C. 651).
 - a. Occupational Safety and Health Standards (General Industry Standards) (29 CFR Part 1910).
 - b. The Safety and Health Standards for Federal Service Contracts (29 CFR Part 1926).
 - c. The Health and Safety Standards for Employees engaged in Hazardous Waste Operations. (50 FR 45654).
- Department of Transportation Rules for the Transportation of Hazardous Materials, 49 CFR Parts 107, 171.1-172.558.
- Endangered Species Act of 1973, 16 U.S.C. 1531. (Generally, 50 CFR Parts 81, 225, 402).
- Wild and Scenic Rivers Act, 16 U.S.C. 1271.
- Fish and Wildlife Coordination Act, 16 U.S.C. 661 note.
- Fish and Wildlife Improvement Act of 1978, and Fish and Wildlife Act of 1956, 16 U.S.C. 742a note.
- Fish and Wildlife Conservation Act of 1980, 16 U.S.C. 2901. (Generally, 50 CFR Part 83).

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4. Other Federal Requirements (Cont.)

- Farmland Protection Policy Act, 7 U.S.C. 4201. (Generally, 7 CFR Part 658).
- Rivers and Harbors Act (33 U.S.C. 403).

5. State Requirements

- Title 35: Env. Prot. Act Subtitle B:

a. Air Pollution Chapter T: Subchapter C:

- 35 IAC 212.121-125,
- 35 IAC 212.421

b. Air Pollution Subchapter A:

- 35 IAC 201.151

c. Air Pollution Subparagraph A: Permits

- 35 IAC 201.141-144,
- 35 IAC 201.146-147,
- 35 IAC 201.149,
- 35 IAC 201.12-165,
- 35 IAC 201.207-210,
- 35 IAC 201.261-265,
- 35 IAC 201.282-283,
- 35 IAC 201.301-302

d. Air Pollution Subchapter C, Emissions Sids. and Limitations for Stationary Sources

- 35 IAC 212.110,
- 35 IAC 212.181-185
- 35 IAC 212.302,
- 35 IAC 212.304-310,
- 35 IAC 212.312-315,
- 35 IAC 212.321-323,
- 35 IAC 212.361,
- 35 IAC 212.381,
- 35 IAC 212.422,
- 35 IAC 212.441,
- 35 IAC 212.455-457,
- 35 IAC 212.461-463,
- 35 IAC 212.681,
- 35 IAC 215.101-102,

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APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS g/

- Title 35: Env. Prot. Act Subtitle B: (Cont.)
 - d. Air Pollution Subchapter C, Emissions Stds. and Limitations for Stationary Sources (Cont.)
 - 35 IAC 215.121-122,
 - 35 IAC 215.141.144,
 - 35 IAC 215.301-304,
 - 35 IAC 215.500,
 - 35 IAC 215.541,
 - 35 IAC 215.562,
 - 35 IAC 231.110,
 - 35 IAC 231.122,
 - 35 IAC 231.130,
 - 35 IAC 231.140,
 - 35 IAC 231.150,
 - 35 IAC 231.160,
 - 35 IAC 231.180,
 - 35 IAC 231.190,
 - 35 IAC 231.200,
 - 35 IAC 231.210,
 - 35 IAC 231.230,
 - 35 IAC 231.240,
 - 35 IAC 231.250,
 - 35 IAC 231.260,
 - 35 IAC 231.320,
 - 35 IAC 309.1.1-191
 - e. Air Pollution Subchapter K:
 - 35 IAC 240.103-104,
 - 35 IAC 240.121
 - 35 IAC 243.104-108,
 - 35 IAC 243.121-126
- Title 35: Env. Prot. Subtitle C:
 - a. Water Pollution Subpart B: General Use Water Quality Standards
 - 35 IAC 302.208
 - 35 IAC 302.210
 - 35 IAC 304.120-126,
 - 35 IAC 304.201.206,

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- Title 35: Env. Prot. Subtitle C: (Cont.)
 - a. Water Pollution Subpart B: General Use Water Quality Standards (Cont.)
 - 35 IAC 3044.301,
 - 35 IAC 306.201,
 - 35 IAC 306.302-306,
 - 35 IAC 306.401-406,
 - 35 IAC 309.201-282
 - b. Water Pollution Subpart C: Public and Food Processing Water Supply Standards
 - 35 IAC 302.304
 - 35 IAC 304.102-106,
 - 35 IAC 304.141,
 - 35 IAC 305.102-103,
 - 35 IAC 305.306,
 - 35 IAC 305.102,
 - 35 IAC 307.101-105
- Title 35: Env. Prot. Subtitle F:
 - a. Public Water Supplies Subpart B:
 - Chemical and Physical Quality 35 IAC 604.202
 - Public Water Supplies 35 IAC 604.203-204, 605.103
- Title 35 Env. Prot. Act Subtitle G:
 - a. Waste Disposal C:
 - 35 IAC 700.101-504,
 - 35 IAC 702.101-187,
 - 35 IAC 703.101-246,
 - 35 IAC 704.101-203,
 - 35 IAC 705.121-212,
 - 35 IAC 720.101-122,
 - 35 IAC 721.101-133,
 - 35 IAC 722.110-131,
 - 35 IAC 724.101-451,
 - 35 IAC 725.101-530,
 - 35 IAC 726.120-180,
 - 35 IAC 730.101-152 Dept. of Mines and Minerals Rule IIA,
 - 35 IAC 809.101-802,
 - 35 IAC 811

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- Title 35 Env. Prot. Act Subtitle G: (Cont.)
 - b. Sanitary Landfills Subpart E: Closure and Postclosure
 - 35 IAC 807.301-315,
 - 35 IAC 807.318,
 - 35 IAC 807.501-524,
 - 35 IAC 807.600-666
- Title 35 Env. Prot. Act. Subtitle H:
 - a. Noise
 - 35 IAC 902.101,
 - 35 IAC 902.102,
 - 35 IAC 902.120-125,
 - 35 IAC 902.140-141
- Title 92 IL Adm. Code, Transportation Subchapter C:
 - a. Haz. Mat.
 - 92 IAC 171.1-317,
 - 92 IAC 172.1000-2215,
 - 92 IAC 173.2000-3000
- Illinois Water Well Construction Code Law
(Ill. Rev. Stat. 1987 Ch. 111 1/2, pars. 116, 111-118, as amended)
- Illinois Water Well and Pump Installation Contractors Licensing Act
(Ill. Rev. Stat. 1987 Ch. 111, pars. 7101-7130, as amended).
- PA 85-1195 Part I:
Hazardous Waste Crane and Hoisting Equipment Operators Licensing Act (S.H.A. Ch. 11, par. 7701 et seq., as amended)
- I.D.O.T.
Dir. of Highways
Sec. 15 Ill. Vehicle Code Based on Federal Bridge Formulas
- State Field Sampling Procedures

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APPENDIX A

APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS ^{a/}

OTHER FEDERAL AND STATE CRITERIA, ADVISORIES, AND GUIDANCE TO BE CONSIDERED ^{a/}

1. Federal Criteria, Advisories, and Procedures

- Health Effects Assessments (HEAs) and Proposed HEAs, ("Health Effects Assessment for (Specific Chemicals), "ECAO, USEPA, 1985).
- Reference Doses (RfDs). ("Verified Reference Doses of USEPA," ECAO-CIN 475, January 1986). See also Drinking Water Equivalent Levels (DWELs), a set of medium-specific drinking water levels derived from RfDs. (See USEPA Health Advisories, Office of Drinking Water, March 31, 1987).
- Carcinogen Potency Factors (CPFs) (e.g., Q1 Stars, Carcinogen Assessment Group [CAG] Values), (Table 11, "Health Assessment Document for Tetrachloroethylene (Perchloroethylene)," USEPA, OHEA/6008 82/005F, July 1985).
- Waste load allocation procedures, EPA Office of Water (40 CFR Part 125, 130).
- Federal Sole Source Aquifer requirements (see 52 FR 6873, March 5, 1987).
- Public health criteria on which the decision to list pollutants as hazardous under Section 112 of the Clean Air Act was based.
- Guidelines for Groundwater Classification under the EPA Groundwater Protection Strategy.
- Advisories issued by PWS and NWPS under the Fish and Wildlife Coordination Act.
- OSHA health and safety standards that may be used to protect public health (non-workplace).
- Health Advisories, EPA Office of Water.
- EPA Water Quality Advisories, EPA Office of Water, Criteria and Standards Division.

2. USEPA RCRA Guidance Documents

- Interim Final Alternate Concentration Limit Guidance Part I: ACL Policy and Information Requirements (July, 1987)
 - a. EPA's RCRA Design Guidelines
 - b. Permitting Guidance Manuals
 - c. Technical Resource Documents (TRDs)
 - d. Test Methods for Evaluating Solid Waste

3. USEPA Office of Water Guidance Documents

- a. Pretreatment Guidance Documents
- b. Water Quality Guidance Documents
- c. NPDES Guidance Documents
- d. Groundwater/UIC Guidance Documents
- e. Groundwater Protection Strategy (August 1984).
- f. Clean Water Act Guidance Documents

APPENDIX A

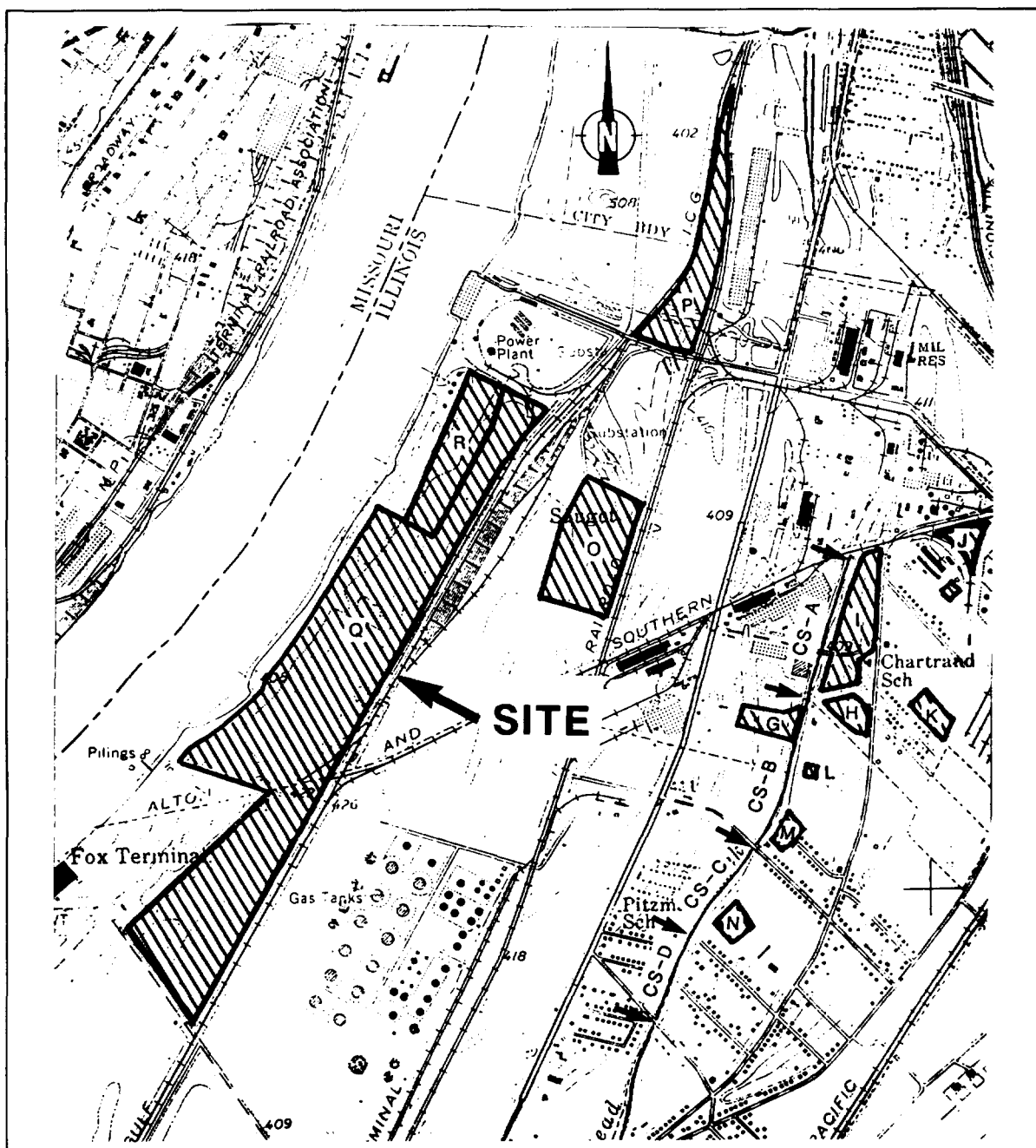
APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS ^{a/}

OTHER FEDERAL AND STATE CRITERIA, ADVISORIES, AND GUIDANCE TO BE CONSIDERED ^{a/}

4. EPA Manuals from the Office of Research and Development
 - SW 846 methods - laboratory analytic methods (November 1986)
 - Lab protocols developed pursuant to Clean Water Act Section 304(h).
5. Nonpromulgated State Advisories
 - State approval of water supply system additions or developments.
 - State groundwater withdrawal approvals.
 - Superfund program groundwater cleanup goals.
 - Recommended allowable drinking water limits.
 - 10^{-5} risk level

Source: EPA CERCLA COMPLIANCE WITH OTHER LAWS MANUAL; May 6, 1988 (OSWER Directive 9234.1-01).

- ^{a/} This is the list of potentially applicable or relevant and appropriate requirements found in the October 2, 1985, Compliance Policy with additions. As additional requirements are promulgated, they will be considered potentially applicable or relevant and appropriate and added to this list.
- ^{b/} In authorized States, Federal regulations promulgated under RCRA are not applicable as a State requirement until the State adopts those regulations through its own legislative process, but probably would be relevant and appropriate as a federal requirement. Federal regulations promulgated pursuant to the Hazardous and Solid Waste Amendments of 1984, however, are effective immediately in all 50 states, and are potentially applicable as Federal requirements.
- ^{c/} 40 CFR Part 264 regulations apply to permitted facilities and may be relevant and appropriate to other facilities.
- ^{d/} Only Subpart F groundwater monitoring requirements under 40 CFR 264 are ARAR. The Subpart F groundwater monitoring requirements under 40 CFR 265 are not ARAR.
- ^{e/} 40 CFR Part 6 Subpart A sets forth EPA policy for carrying out the provisions of Executive Orders 11988 (Floodplains Management) and 11990 (Protection of Wetlands).



ecology and environment, inc.

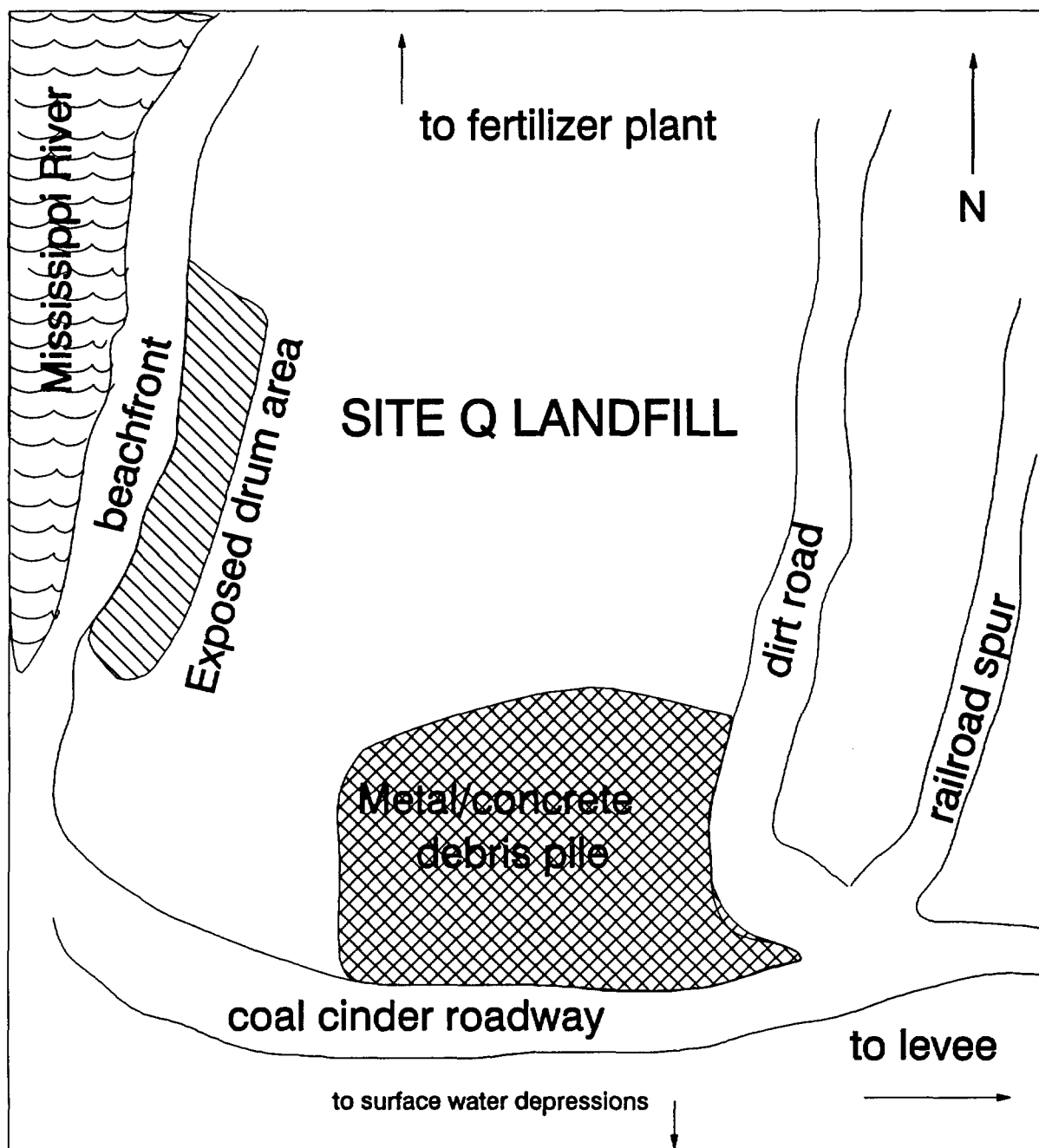
Technical Assistance Team

Region V

111 West Jackson Blvd.

Chicago, IL 60604

TITLE SITE LOCATION MAP		FIGURE # 1
SITE SAUGET AREA 2 - SITE Q		SCALE 1" = 2000'
CITY SAUGET	STATE ILLINOIS	PAN EIL0837SAA



ILLINOIS



ecology and environment, inc.

Technical Assistance Team

Region V

111 West Jackson Blvd.

Chicago, IL 60604

TITLE SITE FEATURES MAP		FIGURE # 2
SITE SAUGET AREA 2 - SITE Q		SCALE NOT TO SCALE
CITY SAUGET	STATE ILLINOIS	PAN EIL0837SAA